

## **REMARKS**

This is a full and timely response to the outstanding final Office Action mailed October 31, 2007. Reconsideration and allowance of the application and pending claims are respectfully requested.

### **Claim Rejections - 35 U.S.C. § 102(b)**

Claims 1-8 and 18-23 have been rejected under 35 U.S.C. § 102(b) as being anticipated by *Hansen, et al.* ("Hansen," U.S. Pat. No. 6,407,820). Applicant respectfully traverses.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(b).

In the present case, not every feature of the claimed invention is represented in the Hansen reference. Applicant discusses the Hansen reference and Applicant's claims in the following.

#### **A. The Hansen Disclosure**

Hansen discloses a system and method for managing production printing workflow. As described by Hansen, the system comprises a computer network 112, that may be in the form of a local area network, that is located at a print shop. *Hansen*, column 3, lines 52-65.

Production workflow using the system is described to comprise five main stages: job origination 102, job submission 104, job preparation 106, print production 108, and final fulfillment 104. See *Hansen*, Figure 1. In job origination 102, documents and instructions are received from a customer as a "job." *Hansen*, column 4, lines 4-6. In job submission 104, the job is entered into the print shop's production system or workflow. *Hansen*, column 4, lines 22-24. In job preparation 106, the documents of the job are prepared for printing according to the customer instructions. *Hansen*, column 5, lines 18-19. In print production, a final form of the documents is sent to a print server 120 that will distribute the documents to a final output device 122. *Hansen*, column 7, lines 25-29. Finally, in final fulfillment 110, the finished output is produced on the final output device 122 (e.g., printer). *Hansen*, column 8, lines 7-10.

## **B. Applicant's Claims**

As is noted above, *Hansen* fails to teach several of Applicant's claim limitations. Applicant discusses some of those claim limitations in the following.

## 1. Claims 1-8

Applicant's independent claim 1 provides as follows:

1. A method of performing automated packaging on a printed output in a commercial printing environment that includes a designer location and a print service provider location, said method comprising:

- creating at the designer location a digital file that represents an image to be printed;

- receiving at the designer location from the print service provider location real time configuration information regarding a print production device at the print service provider location;

- generating at the designer location packaging instructions that describe how the printed output is to be packaged for shipment after printing, the packaging instructions being generated relative to the received configuration information;

- creating at the designer location a high performance file that contains the digital file and the packaging instructions;

- submitting the high performance file from the designer location to the print service provider location via an electronic network; and

- generating at the print service provider location a printed output of the digital file and packaging the printed output at the print service provider location in accordance with the packaging instructions contained within the high performance file.

As a first matter regarding claim 1, Applicant notes that Hansen does not disclose any "designer location". Instead, as described above, Hansen only discloses a "print shop." Regarding the "job preparation 106" identified in the Office Action, the job preparation is an action, not a location. Furthermore, that action is performed at the print shop, not a location of the designer of the document that is to be printed.

Second, Hansen does not teach "creating at the designer location a digital file that represents an image to be printed". Again, Applicant notes that Hansen does not mention any "designer location" and instead limits his disclosure to attributes of a print shop. It logically follows then that Hansen does not teach creating a digital file "at the designer location" as required by claim 1.

Third, Hansen does not teach "receiving at the designer location from the print service provider location real time configuration information regarding a print production device at the print service provider location". As stated above, Hansen does not mention any "designer location" and instead limits his disclosure to attributes of a print shop. It logically follows then that Hansen does not teach receiving real time configuration information regarding a print production device "at the designer location" as required by claim 1. Moreover, even if one were to interpret Hansen's print shop as incorporating a "designer location" (e.g., in the form of a job preparation station 116), Hansen still fails to teach such a location receiving "real time configuration information regarding a print production device at the print service provider location". Applicant notes that column 6, lines 16-50 of the Hansen reference, which were cited by the Examiner in addressing the "real time configuration information" limitation, do not say anything about "real time configuration information" whether it be about a "print production device" or other component of Hansen's system. If the Examiner disagrees, Applicant requests that the Examiner explicitly identify the specific disclosure of the Hansen reference (e.g., in the form of a quoted excerpt) that comprises a teaching of real time configuration information regarding a print production device. Applicant notes that the Examiner has merely block copied Applicant claim limitation, cited "col. 6, lines 16-50," and stated the phrase

"facilitate and manage flow jobs" without providing any meaningful explanation of what particular disclosures of the Hansen reference teach Applicant's claim limitation and why.

Fourth, Hansen does not teach "generating at the designer location packaging instructions that describe how the printed output is to be packaged for shipment after printing, the packaging instructions being generated relative to the received configuration information". Again, Hansen does not mention any "designer location" and instead limits his disclosure to attributes of a print shop. It logically follows then that Hansen does not teach generating packaging instructions "at the designer location" as required by claim 1. Moreover, even if one were to interpret Hansen's print shop as incorporating a "designer location" (e.g., in the form of a job preparation station 116), Hansen still fails to teach such a location generating packaging instructions "that describe how the printed output is to be packaged for shipment after printing". Indeed, Hansen does not even discuss packaging documents for shipment at all. The only "packages" Hansen speaks of are software packages. Regarding the Examiner's citation of column 9, lines 23-30 of the Hansen reference, that portion of the Hansen reference says nothing whatsoever about such "packing instructions". In response to the Examiner's statement that "tickets are visually represented to the workstation 116 display," visual representation of tickets does not inherently require visual representation of "packaging instructions". Given that Hansen does not describe generating packaging instructions that describe how printed output is to be packaged for shipment after printing, it follows that Hansen likewise fails to teach generating those instructions "relative to the received configuration information".

Fifth, Hansen does not teach "creating at the designer location a high performance file that contains the digital file and the packaging instructions". Again, Hansen does not

mention any "designer location" and instead limits his disclosure to attributes of a print shop. It logically follows then that Hansen does not teach creating a high performance file "at the designer location" as required by claim 1. Moreover, Applicant notes that Hansen fails to teach creating a high performance file that contains a digital file and "packaging instructions". Again, Hansen is silent as packaging for shipment. It logically follows then that Hansen does not teach creating a file that contains packaging instructions.

Sixth, Hansen does not teach "submitting the high performance file from the designer location to the print service provider location via an electronic network". Again, Hansen does not teach a high performance file that contains "packaging instructions" and further does not mention any "designer location". It logically follows then that Hansen does not teach submitting a high performance file "from the designer location" as required by claim 1.

Seventh, Hansen does not teach "packaging the printed output at the print service provider location in accordance with the packaging instructions contained within the high performance file". As stated repeated above, Hansen says nothing of "packaging" a printed output, or anything else for that matter. It logically follows then that Hansen does not teach "packaging the printed output . . . in accordance with the packaging instructions contained within the high performance file".

In view of the foregoing, it is clear that Hansen does not anticipate claim 1 or claims 2-8 which depend therefrom. Applicant therefore requests that the rejections of claims 1-8 be withdrawn.

## **2. Claims 18-23**

Applicant's independent claim 18 provides as follows:

18. A system for performing automated packaging on a printed output, said system comprising:

a designer location configured to:

create a digital file that represents an image to be printed,  
receive from a print service provider location real time  
configuration information regarding a print production  
device at the print service provider location,  
generate packaging instructions that describe how the printed  
output is to be packaged for shipment after printing,  
the packaging instructions being generated relative to  
the received configuration information,  
create a high performance file that contains the digital file and  
the packaging instructions, and  
submit the high performance file to the print service provider  
location via an electronic network; and

a print service provider location configured to generate a printed  
output of the digital file and package the printed output at the print service  
provider location in accordance with the packaging instructions contained  
within the high performance file.

As described above, Hansen does not teach a "designer location". Hansen fails to anticipate claim 18 for at least that reason.

Applicant further notes that Hansen does not teach a designer location, or other location for that matter, configured to: "receive from a print service provider location real time configuration information regarding a print production device at the print service

provider location", "generate packaging instructions that describe how the printed output is to be packaged for shipment after printing, the packaging instructions being generated relative to the received configuration information", or "create a high performance file that contains the digital file and the packaging instructions" for reasons described above in relation to claim 1.

Furthermore, also for reasons described above, Hansen fails to teach a print service provider location configured to "package the printed output at the print service provider location in accordance with the packaging instructions contained within the high performance file".

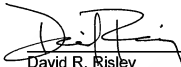
In view of the above, it is clear that Hansen does not anticipate claim 18 or claims 19-23 which depend therefrom. Applicant therefore requests that the rejections of claims 18-23 be withdrawn.



### CONCLUSION

Applicant respectfully submits that Applicant's pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Risley', is written over a solid horizontal line.

David R. Risley  
Registration No. 39,345